

AUDREY LESSNER

VS

U.S. DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS

FILED

DEC 22 2020

§

IN THE UNITED STATES' DISTRICT  
COURT FOR THE NORTHERN

CLERK, U.S. DISTRICT COURT

By

Deputy §

AMARILLO DIVISION

TEXAS DEPARTMENT OF FAMILY and §

PROTECTIVE SERVICES §

2F-20CV-293-Z

COPY

## Petition to Reinstate Parental Rights

Now Comes Audrey Lessner, petitioning the United States' District Court to reinstate her parental rights; after wrongful termination by Texas Department of Family and Protective Services, Randall County Court and by a jury.

1. Child Protective Services, a.k.a. the "Department," had NO legal grounds to terminate Audrey Lessner's parental rights, according to their OWN findings and handbook of policy and procedures.
  - 1.1 The first reason is severe or chronic abuse.
  - 1.2 The second reason for parental right's termination is sexual abuse.
  - 1.3 The third reason is abuse or neglect of other children in the home.
  - 1.4 The fourth reason is abandonment of a child.
  - 1.5 The fifth reason is long term mental illness or deficiency of the parent.
  - 1.6 The sixth reason long-term alcohol or drug-induced capacity of the parent.
  - 1.7 The seventh reason is failure to support or maintain contact with the child(ren).
  - 1.8 The eighth reason is involuntary termination of the rights of the parent to another child.

The Department FAILED to find ANY guilt concerning the allegations brought against Audrey Lessner. Therefore the Department had NO legal grounds to terminate Audrey Lessner's parental rights to begin with.

- 1.A The daughters have requested to be returned to their mother, however this cannot happen until Audrey Lessner's parental rights have been reinstated.
- 1.B The testimonies of the Department and their "experts" all agree that Audrey Lessner IS protective and can in fact provide the needs for her children of this suit.
- 1.C Audrey Lessner has FULL custody of her son, Anthony William Lessner Jr. even though her parental rights have been terminated on her four daughters.

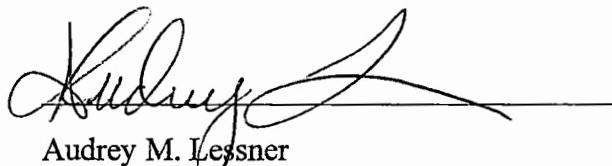
- 1.D The report from Indiana clearly states that Audrey Lessner is in **TRUTH** a fit parent and has the ability to provide all the needs for her children.
- 1.E Reports from the Texas “Department” also have stated that Audrey Lessner has the ability to provide all the needs for Anthony Lessner Jr.
- 1.F Therefore Audrey Lessner has the **ABILITY** to provide for her other four children as well.
- 1.G The “Department” **CANNOT** under ANY circumstances make a differential determination to allow the parent to have **FULL** custody of one child and **NOT** the others.
- 1.H On recording, the Department’s Executive office member, Jerome Green, stated to Audrey Lessner; she by **ALL** findings should have custody of her daughters because there was no findings of guilt, on her part.
- 1.I By the admittance of the head of the Department themselves and the OCR. They have agreed there is **NO** reason Audrey Lessner’s parental rights should have been terminated.
- 1.J The lack of investigation of the Department gave the loop hole for the jury to wrongly terminate Audrey Lessner’s rights even though the judge, Richard Dambold; should have- by all accounts- allowed the jury to make a separate decision on terminating both Anthony Lessner Sr. and Audrey Lessner’s parental rights.
- 1.K The juror who works with Nikelle Grant stated that they made a decision **SOLEY** based on the thought that Audrey Lessner was incapable of providing for her children in her “condition” and “mental state.”
- 2. **The Constitution gives absolute right to the parent when it comes to rearing the child as long as the child’s Constitutional rights are not violated by the parent...**
  - 2.1 Audrey Lessner committed no crime.
  - 2.2 There was reason to believe that Audrey Lessner was denied her rights to reconcile with her children. Even after reaching out to the Department to resolve the family matter.
  - 2.3 Audrey Lessner was wrongfully bullied by the Department and the Randall County Sheriff’s Department criminally trespassed her, threatening her with jail, if she attempted to contact her children or attempt to obtain evidence from Randall County Sheriff’s Department.
- 3. **There was no meeting nor conversation with either the Ad Litem, Harry Ingram nor the LPC, Sarah Lynn Jennings; to resolve the matter at stake concerning the safety of the Lessner family.**
  - 3.1 The Department is required by **THEIR** rules and procedures to allow the parent communication with the Department’s counselor for the children in order to resolve the issues raised for concern.

- 3.2 The Ad Litem is also obligated to speak on behalf of the children's best interest knowing that the desire of the children is ABSOLUTE for their stability and safety.
- 3.3 There was NO attempt to return the daughters after the 19<sup>th</sup> of April 2017.
- 3.4 Violations deprived Audrey Lessner to defend her right to prove her worthiness of keeping her parental rights and sustaining her relationship with ALL her children!
- 3.5 The Department CANNOT dictate to the parents who they can and cannot raise. [I]f Audrey Lessner is, in truth, a fit parent for Anthony Lessner Jr. She [I]s, in truth, a fit parent for her daughters as well.

**PRAYERS:**

1. Audrey Lessner prays the court will grant this petition on behalf of her right to raise her children under the protection of the Declaration of Independence and the Constitution of the United States and Texas Constitution.
2. Audrey Lessner prays the court issue her parental rights with the acknowledgement that her parental rights were violated and wrongfully terminated.
3. Audrey Lessner prays the court give her restitution for the pain and suffering she and her family have endured.
4. Audrey Lessner prays the court give her compensation for the violations of her and her family's Constitutional rights.
5. Audrey Lessner prays the court reverses the adoptions of K.P.L, B.A.L., A.G.L. and C.J.L.

Respectfully Submitted,



Audrey M. Lessner

Pro Se/Mother